

Via CM/ECF

February 11, 2022

The Honorable Denise L. Cote Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

RE: United States v. Gregory Plaskett, No. 1:11-cr-00184-DLC-2 (S.D.N.Y.)

Dear Judge Cote:

I am writing to request an extension of time for my client, Mr. Gregory Plaskett ("Plaskett") to submit a notice of appeal from the Court's January 28, 2022, order (ECF 136) denying Plaskett's motion for compassionate release.

Plaskett was provided with timely notice of the Court's order denying his motion for compassionate release. However, communication with Plaskett has been inhibited because of a national BOP lockdown which commenced on January 31, 2022.

Plaskett's mother contacted me yesterday indicating that Plaskett would like to file a notice of appeal. This information was apparently conveyed via a phone call from Plaskett to his mother.

I would like the opportunity to personally confer with Plaskett about whether to file a notice of appeal. Under the circumstances, I respectfully submit that good cause is present to extend the time to file Plaskett's notice of appeal until March 14, 2022. *See*, Fed. R. App. P. 4(b)(4). The requested March 14, 2022, date is 31 days from the current February 11, 2021, due date for Plaskett's notice of appeal. While Rule 4(b)(4) only allows the Court to extend the time to file a notice of appeal by 30 days, the 30th day after February 11, 2021, is a Sunday. Therefore, consistent with Fed. R. Civ. P. 6(a)(1)(C) the due date, with a 30 day extension, is actually the next business day--March 14, 2022.

Sincerely,

Brandon Sample

cc: AUSA Camille Fletcher via CM/ECF

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